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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ESTATE OF VALERIE YOUNG, by VIOLA  
YOUNG, as Administratrix of the  
Estate of Valerie Young, and in her  
personal capacity, SIDNEY YOUNG,  
and LORETTA YOUNG LEE,

Plaintiffs,

-against-

STATE OF NEW YORK OFFICE OF MENTAL  
RETARDATION AND DEVELOPMENTAL  
DISABILITIES, PETER USCHAKOW,  
personally and in his official  
capacity, JAN WILLIAMSON, personally  
and in her official capacity, SURESH  
ARYA, personally and in his  
individual capacity, KATHLEEN  
FERDINAND, personally and in her  
official capacity, GLORIA HAYES,  
personally and in her official  
capacity, DR. MILOS, personally and  
in his official capacity;

Defendants.

- - - - -x

350 Fifth Avenue  
New York, New York

March 27, 2008  
10:25 A.M.

1

2 DEPOSITION of JOVAN MILOS, M.D., one  
3 of the Defendants in the above-entitled  
4 action, held at the above time and place,  
5 taken before Gretchen A. Milton, a  
6 Shorthand Reporter and Notary Public of  
7 the State of New York, pursuant to the  
8 Federal Rules of Civil Procedure, Notice  
9 and stipulations between Counsel.

10

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12 \* \* \*

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14

15 APPEARANCES:

16

17 CATAFAGO LAW FIRM, P.C.  
18 Attorneys for Plaintiffs  
350 Fifth Avenue  
New York, New York 10118

19 BY: JACQUES CATAFAGO, ESQ.

20

21 STATE OF NEW YORK  
22 OFFICE OF THE ATTORNEY GENERAL  
ANDREW M. CUOMO  
Attorneys for Defendants  
23 120 Broadway  
New York, New York 10271-0332

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25 BY: JOSE L. VELEZ, ESQ.

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APPEARANCES:  
(Continued)

STATE OF NEW YORK  
OFFICE OF MENTAL RETARDATION AND  
DEVELOPMENTAL DISABILITIES  
Attorneys for Defendants  
75 Morton Street  
New York, New York 10014

BY: PATRICIA DELORY PAWLOWSKI, ESQ.

\* \* \*

1 JOVAN MILOS, M.D.

2 order to prepare a report?

3 A. Yes.

4 Q. What did you do with those notes,  
5 if you remember?

6 A. I don't know where it is now.

7 Q. When was the last time you saw  
8 those notes?

9 A. When I made the report.

10 Q. Who did you give those notes to  
11 after you made the report?

12 A. It may be in my cabinet.

13 Q. It may be in a cabinet?

14 A. It may be in the cabinet.

15 MR. CATAFAGO: Counsel, to extent  
16 those notes exist we will deal with  
17 it.

18 MR. VELEZ: You have been  
19 informed of any and all documents  
20 relating to this case.

21 MR. CATAFAGO: I might have a  
22 problem there. I need the document if  
23 he has it.

24 MR. VELEZ: Off the record.

25 (Discussion held off the record.)

1 JOVAN MILOS, M.D.

2 was weekend or... and I was not there on a  
3 Sunday.

4 Q. If you would look at the report  
5 now marked as Exhibit 10, Bates No. CQC40,  
6 you have the date of death as June 19,  
7 2005, and the time as 9:32 p.m.

8 A. Yes.

9 Q. Did you learn about it that  
10 evening or the next morning?

11 A. The next morning.

12 Q. Who specifically told you that  
13 she had died?

14 A. I don't know. My routine is to  
15 go first to my office, leave the things  
16 that I brought with me, go to the nursing  
17 station, go to the logbook, see what  
18 happened last night. And this is a very  
19 significant event, so as soon as I  
20 entered, I know what happened; that this  
21 is what happened. This has happened.

22 And who actually told me, with  
23 whom I have that conversation, I don't  
24 recall at this moment.

25 Q. Did you speak to anyone about